

1144 Fifteenth St., Suite 2400
Denver, CO 80202
Tel: 303.376.8400
Zane A. Gilmer, Atty. Reg. No. 7-4545
Zane.Gilmer@stinson.com

David R. Barnard (Admitted Pro Hac Vice)
1201 Walnut Street, Suite 2900
Kansas City, MO 64106
Tel: 816.842.8600
David.Barnard@stinson.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

JORNS & ASSOCIATES LLC,)
)
 Plaintiff,)
)
 v.) Case No. 2:23-cv-247-KHR
)
 WCMS MEDIA LLC and JESS E. ROGERS, SR.,)
)
 Defendants.)
)

Plaintiff Jorns & Associates LLC and Defendants WCMS Media LLC and Jess E. Rogers, Sr. (jointly “the Parties”) hereby move the Court for a thirty (30) day stay of pending case deadlines. On March 7, 2025, the Parties reached a settlement on all material terms via telephone calls and emails. The Parties require some additional time to draft and execute a written settlement agreement of all claims in this case. Accordingly, the Parties ask for a thirty (30) day stay of

pending case deadlines while they complete this process. This is not done for any reason of delay or excuse and should resolve all disputes in the case.

WHEREFORE, the Parties jointly, respectfully move the Court for its order granting a thirty (30) day stay in the case deadlines and for such other and further relief the Court deems appropriate.

Dated: March 10, 2025.

Respectfully submitted,

By: /s/ Zane A. Gilmer

Zane A. Gilmer (Wyoming Bar #7-4545)

STINSON LLP

1144 Fifteenth Street, Suite 2400

Denver, Colorado 80202

Phone: 303-376-8416

Fax: 303-578-7966

zane.gilmer@stinson.com

*Attorneys for Plaintiff and Counterclaim-
Defendant*

By: /s/ Paula Fleck

Paula Fleck (Wyoming Bar #6-2660)

HOLLAND & HART LLP

645 S. Cache Street, Suite 100

P.O. Box 68

Jackson, WY 83001

Telephone: (307) 739-9741

Facsimile: (307) 739-9744

pfleck@hollandhart.com

Steven Fried (Admitted Pro Hac Vice)

954 Lexington Avenue #1051

New York, NY 10021

(917) 280-2468

sfried@olyverapp.com

*Attorneys for Defendants and Counterclaim
Plaintiffs*